



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

January 14, 2013

HAND DELIVERED
CHEVRON RICHMOND REFINERY
In Reply Refer to:
Chevron Richmond Refinery, Richmond, CA

Nigel Hearne, Manager
Chevron Richmond Refinery
841 Chevron Way
Richmond, CA 94801

RE: Request for Information
Chevron Richmond Refinery

Dear Mr. Hearne:

The United States Environmental Protection Agency ("EPA") Region IX is continuing our investigation of the Chevron Richmond Refinery (the "Facility"), located at 841 Chevron Way, Richmond California 94801, which is owned and operated by Chevron Corporation (the "Company"). Inspectors will be onsite beginning on Tuesday, January 15, 2013, at 9:00 a.m. to continue the process of document review and interview of Facility personnel. The request for information enclosed with this letter ("Information Request") identifies personnel EPA requests to interview during the week of January 15, 2013, and seeks information and documents relating to the Company's compliance with Section 103 of the Comprehensive Environmental Response, Compensation, and Liability Act ("CERCLA"), 42 U.S.C. § 9603; Sections 302 through 312 of the Emergency Planning and Community Right-to-Know Act ("EPCRA"), 42 U.S.C. §§ 11002 – 11022; and Section 112(r) of the Clean Air Act ("CAA"), 42 U.S.C. § 7412(r).

This Information Request is authorized pursuant to the following federal environmental statutes:

- CERCLA, as amended, 42 U.S.C. § 9604;
- EPCRA, 42 U.S.C. § 11001 *et seq.*; and
- CAA, as amended, 42 U.S.C. § 7414.

Please provide the requested information, employees for interview and documents for inspectors' review at the time of their arrival for onsite inspection as described in paragraph one of this letter. **Ensure that each document provided in response to this information request indicates the EPA question number (see enclosed "Instructions" and "Information Request").** EPA may require the Company to produce copies of some of the documents reviewed. **Following onsite review, inspectors will return the documents to the Company and indicate which documents will need to be copied and provided to EPA.** Electronic copies are preferable. EPA believes that much of the requested information is, or should be, readily available at the Facility.

Please note that the Company's compliance with this Information Request is mandatory.

Failure to respond fully and truthfully may result in enforcement action by EPA pursuant to Section 104(e)(5) of CERCLA, 42 U.S.C. § 9604(e)(5), or Section 113(a)(3) of the Clean Air Act, 42 U.S.C. § 413(a)(3). These statutory provisions authorize EPA to seek penalties up to \$37,500 for each day of noncompliance. Please be further advised that provision of false, fictitious, or fraudulent statements or representations may subject you to criminal penalties under 18 U.S.C. § 1001.

If you have questions about the legal aspects of this Information Request, please contact Joshua Wirtschafter, Assistant Regional Counsel, U.S. EPA Region IX, at (415) 972-3912. The Region IX technical contact for this information request is Mary Wesling, EPCRA/RMP Compliance Officer. Ms. Wesling can be reached at (415) 972-3080. We thank you in advance for your cooperation.

Sincerely,

Daniel A. Meer, Assistant Director
Superfund Division

Enclosures
Information Request (Instructions, Definitions, Questions)

cc: M.Wesling, U.S. EPA Region IX
J. Wirtschafter, U.S. EPA Region IX
M. Farley, Pillsbury

ENCLOSURE

INSTRUCTIONS

1. Please provide a separate response to each request. For each document produced, identify the request to which it is responsive. For electronic copies provided to EPA, also identify the Chevron Bates Numbers.
2. Knowledge or information that has not been memorialized in any document, but is nonetheless responsive to a request, must be provided in a narrative form.
3. The scope of this Information Request includes all information and documents obtained or independently developed by the Company, its attorneys, consultants or any of their agents, consultants, or employees.
4. The Company may not withhold any information from EPA on the grounds that it is confidential business information. EPA has promulgated regulations, under 40 CFR Part 2, Subpart B, to protect confidential business information that it receives. The Company may assert a business confidentiality claim (in the manner specified in 40 CFR § 2.203(b)) for all or part of the information requested by EPA. However, business information is entitled to confidential treatment only if it satisfies the criteria set forth in 40 CFR § 2.208. EPA will disclose business information entitled to confidential treatment only as authorized by 40 CFR Part 2, Subpart B. If no claim of confidentiality accompanies the information at the time EPA receives it, EPA may make it available to the public without further notice.
5. Notice is hereby given, pursuant to 40 CFR §§ 2.301(h) and 2.310(h), that EPA may disclose confidential information provided by the Company to EPA's authorized representatives, including its contractors, Science Applications International Corporation ("SAIC") and Energy and Resource Consulting Group ("ERC"). Confidential information may be disclosed to EPA's authorized representatives for the following reasons: to assist with document handling, inventory and indexing; to assist with document review and analysis for verification of completeness; and to provide expert technical review of the contents of the response. Pursuant to 40 CFR §§ 2.301(h) and 2.310(h), the Company may submit, along with its response to this Information Request, any comments regarding EPA's disclosure of confidential information to its authorized representatives.
6. If information or documents not known or available to the Company at the time of its response to this Information Request later become known or available to it, it must supplement its response to EPA. Moreover, should the Company find at any time after the submission of its response that any portion of the submitted information is false or misrepresents the truth, the Company must notify EPA as soon as possible and provide EPA with a corrected response.
7. If information responsive to a request is not in the Company's possession, custody, or control, identify the persons or entities from whom such information may be obtained. For each individual or entity that possesses responsive information, please provide the following: name, last known or current address, telephone number, and affiliation with the Company or the Facility.
8. If you believe there are grounds for withholding information or documents that are responsive to this request, e.g., attorney-client privilege, you must identify the information or documents and state the basis for withholding.

DEFINITIONS

The following definitions apply to the following terms (words or phrases) as they appear in this Information Request. Defined terms are enclosed in quotation marks:

1. "You" or the "Company" shall mean Chevron Corporation, or its officers, managers, employees, contractors, trustees, partners, successors, assigns, and agents.
2. "Facility" means all buildings, equipment, structures, installations, pipes, or stationary items owned, leased, or operated by Chevron Corporation, at the Chevron Richmond Refinery property or properties located at 841 Chevron Way, Richmond, California, or contiguous or adjacent to that address.
3. "Document" or "documents" shall mean any printing, typing, writing, photostat, or any other copy, microfilm, film record, video record, CD, sound recording, tape, disc, or other type of memory associated with computers, including any instructions necessary to read such material, and any other tangible item recording information.
4. "Chemical" shall mean any extremely hazardous substance listed in Appendices A and B of 40 CFR Part 355; any hazardous substance, as defined in Section 101(14) of CERCLA, including any mixtures of hazardous substances with any other substances, such as petroleum products; and any pollutant or contaminant, as defined in Section 101(33) of CERCLA, including any mixtures of pollutants or contaminants with any substances, such as petroleum products; and any regulated substance listed pursuant to section 112(r)(3) of the Clean Air Act as amended, in 40 CFR § 68.130.
5. "Release" shall have the same definition as that contained in Section 101(22) of CERCLA, and shall include any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including the abandonment or discharging of barrels, containers, and other closed receptacles containing any hazardous substances or pollutants or contaminants.
6. "RLOP" shall mean Richmond Lube Oil Plant.
7. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in the CAA, CERCLA, EPCRA, 40 CFR Part 68, 40 CFR Part 300, or 40 CFR Part 355, in which case the statutory or regulatory definitions shall apply.

INFORMATION REQUEST

REQUESTS REGARDING THE CLEAN AIR ACT SECTION 112(r) RISK MANAGEMENT PROGRAM AND GENERAL DUTY CLAUSE

1. Personnel interview requests. :
 - a. Frederick Walker, Hydroprocessing Section Head
 - b. Johnny Pak, Refinery Business Manager, Hydroprocessing
 - c. Mike Seidlitz, RLOP Senior Manufacturing Specialist
 - d. Christine Haswell, Manager, Base Oil Manufacturing and Technology
 - e. Jessica Stankiewicz, Materials Engineer
2. For process units within the RLOP, provide the following:
 - a. Process Safety Information - RLOP
 - i. List identifying all process equipment, including type (i.e. furnace, preheater, reactor, heat exchanger, etc.), date of construction;
 - ii. Design and construction documentation for all furnaces, preheaters, reactors and heat exchangers in the RLOP unit (may be described as original "books");
 - iii. Positive Material Identification documentation and verification from original construction and through all subsequent inspections/verifications for all furnaces, preheaters, reactors, and heat exchangers in the RLOP unit;
 - iv. Documentation showing original design safe upper and lower operating limits for pressure, temperature and feed rates. Include design basis on all RLOP furnaces, pre-heaters, reactors and heat exchangers;
 - v. Documentation for all increases in safe upper and lower operating limits on RLOP process equipment, including any MOCs initiated to change these limits and documentation referenced during or generated during the MOC process, such as changes in feed rate and composition of feed stock;
 - b. Mechanical Integrity- RLOP
 - i. All worklist form requests for inspections and/or maintenance of equipment in RLOP (since 2001) with dates entered, responses and identify whether work was completed under turn-around or pit-stop;

Include all documentation on how the requests were resolved, and all supporting documentation for denials and/or deferrals related to those requests;

- ii. Inspection History: For pre-heaters, furnaces, reactors and heat exchangers in the RLOP provide, documentation, including planning, description of methods used, resulting data, recommendations and supporting documentation for all inspections since 2001;
- iii. For RLOP process equipment and piping, provide mechanical integrity instructions and/or procedures for repair of leaking piping and process equipment;
- iv. For RLOP process equipment provide procedures for actions to be taken when excessive vibrations, pressure and temperatures or any other condition outside normal operating conditions are present, **including but not limited** to excessive vibration of rotating equipment;
- v. For RLOP equipment and piping, provide the original list which was shown to RLOP operators, post-August 6, 2012, indicating equipment potentially susceptible to any corrosion mechanism and also showing ranking of equipment and piping for relative risk related to corrosion hazards. Indicate which equipment/piping risk ranking was requested by operators to be upgraded after review of the list provided to them;
- vi. For RLOP, any written (hard copy and/or email) communication between RLOP operators and their Head Operators, supervisors, business unit leaders, engineers or corporate management relating to operators concerns involving materials of construction, fitness for service, potential for corrosion, condition of furnaces, preheaters, reactors or heat exchangers, need for inspections and/or maintenance, changes in procedures, equipment operating limits and/or feed rates or feed stock changes from 2008 through December 1, 2012;

c. Management of Change - RLOP

- i. For RLOP process equipment, provide list of management of change (MOC) documents with starting dates, description of subject of MOC extension dates, and completion for the RLOP process equipment; and
- ii. All documentation supporting or relating to any MOCs initiated from 2001 through current date on high pressure feed check valve just upstream of RLOP reactor at F1410.